

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**SIXTH MONTHLY FEE STATEMENT OF CROWE & DUNLEVY, P.C. FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
CO-COUNSEL TO THE DEBTOR FOR THE PERIOD FROM
JUNE 1, 2023 THROUGH JUNE 30, 2023**

Name of Applicant:	Crowe & Dunlevy, P.C.	
Applicant's Role in Case:	Co-Counsel to Debtor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #104)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	06/01/2023	06/30/2023
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$273,113.60 ¹ (80% of \$341,392.00)	
Total Reimbursable Expenses Requested in this Statement:	\$529.51 ²	
Summary Attorney Fees for the Period Covered by this Statement		
Attorneys Fees in this Statement:	\$327,350.00	
Total Actual Attorneys Hours Covered by this Statement:	740.5	
Average Hourly Rate for Attorneys:	\$456.26	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$14,042.00	
Total Actual Paraprofessional Hours Covered by this Statement:	56.9	
Average Hourly Rate for Paraprofessionals:	\$246.78	

¹ Counsel is holding \$0.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], Crowe & Dunlevy, P.C. (“C&D”), as co-counsel to the Debtor, hereby files its *Sixth Monthly Fee Statement of Crowe & Dunlevy, P.C. for Allowance of Compensation for Services Rendered as Co-Counsel to the Debtor for the Period from June 1, 2023 through June 30, 2023* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, C&D seeks interim payment of \$273,113.60 (80% of 341,392.00) as compensation for professional services rendered to the Debtor during the period from June 1, 2023 through June 30, 2023 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$529.51, for a total amount of \$273,643.11 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, C&D submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category as Counsel*

for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Co-Counsel for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughttry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, C&D submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. C&D reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, C&D respectfully submits support for its fees in the amount of \$341,392.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$529.51 for reasonable, actual and necessary expenses incurred during the Fee Period. C&D further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to C&D the amount of \$273,643.11 which is equal to the sum of 80% of C&D's fees and 100% of C&D's expenses incurred during the Fee Period.

Houston, TX

Dated: August 31, 2023

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

2525 McKinnon St., Suite 425

Dallas, TX 75201

Telephone: 737.218.6187

Email: dallaseservice@crowedunlevy.com

**ATTORNEYS FOR DEBTOR ALEXANDER
E. JONES**

CERTIFICATE OF SERVICE

I certify that on August 31, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson Ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com)
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Lodging/Travel/Meals	529.51
Litigation support vendors	0.00

EXHIBIT “B”**SUMMARY OF LEGAL FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>ATTORNEY TIME</u>	<u>PARALEGAL TIME</u>
B110 Case Administration	4.4	4.3
B120 Asset Analysis and Recovery	11.2	1.2
B130 Asset Disposition	1.0	0.0
B140 Relief from Stay/Adequate Protection	20.4	.2
B150 Meetings of & Communications with Creditors	0.00	0.0
B160 Fee/Employment Applications	21.3	5.3
B170 Fee/Employment Objections	27.1	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	4.7	.2
B190 Other Contested Matters	519.10	41.9
B195 Non-Working Travel	6.8	0.00
B210 Business Operations	108.4	2.2
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	5.8	0.00
B250 Real Estate	0.00	0.00
B260 Board of Directors Matters	0.00	0.00
B310 Claims Administration and Objections	8.0	1.6
B320 Plan and Disclosure Statement	2.3	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	740.5	56.9

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



CROWE&DUNLEVY
ATTORNEYS AND COUNSELORS AT LAW

2525 MCKINNON, SUITE 425
DALLAS, TX 75201
(214) 420-2163
TAX I.D. NUMBER 73-1055796

June 30, 2023
Invoice # 761699

Alex "AJ" Jones
ATTN: Shelby A. Jordan
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Responsible Attorney
Vickie L. Driver

Client # 50134
Matter # 00802

Post – petition

INVOICE SUMMARY

Current Invoice Total Fees	\$341,392.00
Current Invoice Total Expenses	<u>\$529.51</u>
Current Invoice Total	<u>\$341,921.51</u>

Payment Instructions

Check Remittance:

Mail To:
Crowe & Dunlevy
Braniff Building
324 N. Robinson Ave., Ste. 100
Oklahoma City, OK 73102

Credit Card Remittance:

<https://www.crowedunlevy.com/makeapayment/>

Wire Remittance:

Bank Name: BancFirst
Routing #103003632
Oklahoma City, OK 73102
Account Name: Crowe & Dunlevy
Account Number 4025023715
Swift Code BFOKUS44

Please refer to Invoice # 761699 and any other invoice numbers being paid on your remittance.

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June 30, 2023Client # 50134
Matter # 00802Invoice # 761699
Responsible Attorney
Vickie L. Driver

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06/01/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests for production by UCC.	2.00
06/01/2023	C. Craig	B190/	Review and analyze drafted declaration from Digital Mountain regarding data collection (.3); draft correspondence to Digital Mountain with questions regarding same (.3).	0.60
06/01/2023	L. Dauphin	B190/	Configure search term reports.	2.50
06/01/2023	J. Davis	B190/	Review and analyze response to MSJ regarding the Connecticut Plaintiffs non-dischargeability claim.	2.50
06/01/2023	V. Driver	B160/	Correspondence with Committee on outstanding fees owed to Debtor professionals.	0.30
06/01/2023	V. Driver	B190/	Review and comment to review protocol for data collection (.4); draft outline of counter proposal to UCC settlement offer and send to internal team for review and comment (1.3).	1.70

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06/01/2023	V. Driver	B210/	Call with FSS regarding employment agreement matters (.3); call with UCC FSS and SubV Trustee discussing employment agreement comments (.5); call with FSS regarding terms of interim comp increase compromise with UCC (.6); mark up provisions of employment agreement for interim approval and send to FSS for review and approval (.5); call with financial advisor to discuss employment compromise, upcoming meetings with client on operational issues and related issues (.8).	2.70
06/01/2023	D. McClellan	B190/	Review case law cited by Texas plaintiffs in motion for summary judgment.	1.20
06/01/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	0.70
06/01/2023	D. McClellan	B190/	Review and analyze trial transcripts for response to Texas plaintiffs' motion for summary judgment.	7.40
06/01/2023	D. McClellan	B190/	Develop strategy for response to Texas and Connecticut plaintiffs' motions for summary judgment.	0.50
06/01/2023	R. Yates	B190/	Analyze standard for comprehensive of record in determining First Amendment standard in bankruptcy court, as opposed to appellate court.	0.30

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06/01/2023	R. Yates	B190/	Edit and circulate draft response brief.	1.10
06/01/2023	R. Yates	B190/	Draft summary of legal issues with the CUPTA award.	2.10
06/01/2023	R. Yates	B190/	Edit substantive due process section of brief.	1.30
06/01/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (4.2); draft and revise response to UCC reserving right to object and analysis of objectionable basis (3.3). [NO CHARGE]	7.50
06/02/2023	C. Craig	B190/	Exchange multiple emails with UCC regarding UCC's requests for production to Debtor.	0.40
06/02/2023	C. Craig	B190/	Develop strategy for document production in response to UCC's requests for production to Debtor. [NO CHARGE]	1.00
06/02/2023	C. Craig	B190/	Review and analyze extensive documents in response to UCC's requests for production to Debtor.	1.50
06/02/2023	C. Craig	B190/	Draft correspondence to UCC regarding email and phone production efforts.	0.50

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06/02/2023	L. Dauphin	B110/	Identify issues reported by Committee related to 05/30/23 document production (.3); edit configuration and modify production to include audio and video inadvertently omitted. (1.0)	1.30
06/02/2023	L. Dauphin	B190/	Continue to prepare search term reports.	2.30
06/02/2023	V. Driver	B110/	Correspondence with individual who claims to have avenues for claim resolution and seek additional information on same.	0.30
06/02/2023	V. Driver	B190/	Emails with mediator regarding settlement discussions.	0.60
06/02/2023	A. Finch	B110/	Review correspondence with UCC re: document production re: 2004 requests.	0.20
06/02/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 May 30 Wednesday (4.0); summarize statements made related to case (.1).	4.10
06/02/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	5.90
06/02/2023	R. Yates	B190/	Edit brief to respond to various arguments raised in summary judgment motion.	1.30
06/02/2023	R. Yates	B190/	Draft response to cases cited in summary judgment motion.	1.00

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06/02/2023	R. Yates	B190/	Make list of topics discussed in summary judgment motion that have yet to be addressed in response.	1.10
06/02/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (1.2); draft and revise response to UCC reserving right to object and analysis of objectionable basis (2.3). [NO CHARGE]	3.50
06/03/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 1 Thursday (4.0); summarize statements made related to case (.2).	4.20
06/03/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	7.80
06/04/2023	V. Driver	B190/	Emails with briefing team for CT and TX regarding affidavit and supporting evidence needed and timing.	0.40
06/04/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 2 Friday (4.0); summarize statements made related to case (.4).	4.40
06/04/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	6.30

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06/05/2023	C. Craig	B190/	Develop strategy for drafting responses to plaintiffs' motions for summary judgment. [NO CHARGE]	1.00
06/05/2023	C. Craig	B190/	Review and analyze underlying state court action pleadings in support of drafting responses to Plaintiffs' motions for summary judgment. [NO CHARGE]	2.00
06/05/2023	C. Craig	B190/	Review and analyze UCC correspondence regarding document production by Debtor.	0.20
06/05/2023	V. Driver	B140/	Review and revise 9019 motion and send to counsel for TX (.8); review and revise order and send comments to TX and FSS counsel (.4); discuss 9019 with counsel for FSS (.4).	1.60
06/05/2023	V. Driver	B160/	Call with B. Schleizer regarding support for Teneo fee statement objection (.4); emails regarding supporting schedules for email (.2).	0.60
06/05/2023	V. Driver	B160/	Emails with A. Reynal regarding sanctions.	0.20
06/05/2023	V. Driver	B190/	Correspondence regarding questions on documents and production (2); call with team to discuss briefing, strategy, and staffing outstanding items (1.2); correspondence with UCC on discovery, document review and production. (.2)	1.60

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Vickie L. Driver

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06/05/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 4 Sunday (2.0); summarize statements made related to case (.2)	2.20
06/05/2023	D. McClellan	B190/	Develop strategy regarding responses to Texas and Connecticut plaintiffs' motions for summary judgment	0.60
06/05/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment	11.80
06/05/2023	C. Stephenson	B190/	Draft summary correspondence regarding settlement analysis and terms.	1.20
06/05/2023	R. Yates	B190/	Coordinate writing responsibilities and develop strategies with Deric J. McClellan	0.90
06/05/2023	R. Yates	B190/	Review legal research (.8); create list of items to add to the brief (.3).	1.10
06/05/2023	R. Yates	B190/	Attend litigation team meeting to discuss brief draft and division of labor	0.70
06/05/2023	R. Yates	B190/	Edit response brief to incorporate revisions	1.60
06/05/2023	R. Yates	B190/	Review and analyze Plaintiff's statement of undisputed material facts for response	1.10

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Vickie L. Driver

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06/05/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (3.1); draft and revise analysis of objectionable basis in preparation for email to UCC reserving objections (2.2). [NO CHARGE]	5.30
06/05/2023	J. Yoon	B190/	Analyze and strategize summary judgment responses and objections to both Connecticut and Texas tort claimants' statement of facts and summary judgment evidence.	0.70
06/05/2023	J. Yoon	B190/	Analyze and review Connecticut state court trial transcripts in preparation to draft fact section of the Connecticut response to summary judgment - specifically focusing on instances in which the debtor was prevented from presenting evidence.	1.70
06/06/2023	C. Craig	B190/	Exchange multiple emails with UCC regarding UCC's requests for production to Debtor.	0.40
06/06/2023	C. Craig	B190/	Review and analyze Motion for Protection filed by ESG.	0.50
06/06/2023	C. Craig	B190/	Review and analyze extensive client documents in response to document requests by UCC.	3.00

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06/06/2023	V. Driver	B170/	Request extension of deadline to reserve fees for payment under interim compensation order (.1); work with B. Schleizer to prepare email reserving certain objectionable fees for payment until fee application per item compensation order. (2.1)	2.20
06/06/2023	V. Driver	B185/	Emails with counsel for UCC on use of 408 discussion email as exhibit.	0.30
06/06/2023	V. Driver	B190/	Emails with document review team on specific document issues (.2); emails on home improvement/repair invoices. (1)	0.30
06/06/2023	V. Driver	B210/	Review and send revised FSS forecast to B. Schelizer and discuss (.1); review and analyze the offer from UCC on employment contract. (.4)	0.50
06/06/2023	V. Driver	B240/	Review POC filed by IRS for payroll taxes and analyze same (.5); send to FSS for review (.2); send to tax accountant for research on same (.2).	0.90
06/06/2023	M. Figueroa	B190/	Review and evaluate extensive client documents in response to UCC's 2004 requests for production.	0.50

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Vickie L. Driver

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06/06/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 5 Monday (4.0); summarize statements made related to case (.1).	4.10
06/06/2023	D. McClellan	B190/	Develop strategy regarding responses to Texas and Connecticut plaintiffs' motions for summary judgment.	0.70
06/06/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	9.60
06/06/2023	E. Weaver	B160/	Download and review first, second and third monthly fee statements filed by Teneo Capital, circulate to team and docket objection deadline for same.	0.30
06/06/2023	E. Weaver	B185/	Review agreed order to extend time to assume commercial real property lease with BCC UBC, LLC and docket extended date to assume or reject.	0.20
06/06/2023	E. Weaver	B190/	Telephone call with Kathy Nordenhaug regarding Contini invoices.	0.10
06/06/2023	E. Weaver	B190/	Review emergency motion for protection by Elevated Solutions Group, LLC and docket objection deadline for same.	0.20

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06/06/2023	E. Weaver	B190/	Email correspondence to and from CRD to confirm page limit requirement for response/reply to MSJ.	0.20
06/06/2023	E. Weaver	B190/	Search for unredacted version of UCC's 2004 requests.	0.20
06/06/2023	E. Weaver	B310/	Download and review amended IRS claim and circulate to team.	0.30
06/06/2023	R. Yates	B190/	Draft responses to individual statements of material facts 1-58 (2.0); review record regarding the same (2.0); coordinate research regarding the same (.9).	4.90
06/06/2023	J. Yoon	B170/	Analyze and review Teneo's first, second, and third fee statements for objectionable fees due to overstaffing, and unnecessary financial analysis (0.4); draft and revise analysis and calculation of objectionable fee amounts and basis (1).	1.40
06/06/2023	J. Yoon	B190/	Analyze and review Connecticut state court trial transcripts in preparation to draft fact section of the Connecticut response to summary judgment - specifically focusing on instances in which the debtor was prevented from presenting evidence and when default principles were used to establish malicious intent.	5.70

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Responsible Attorney
Vickie L. Driver

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06/07/2023	C. Craig	B190/	Review and analyze underlying state court action pleadings in support of drafting responses to Plaintiffs' motions for summary judgment. [NO CHARGE]	3.00
06/07/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	2.00
06/07/2023	V. Driver	B130/	Review and respond to emails from personal attorney on issues related to ownership of property.	0.30
06/07/2023	V. Driver	B140/	Preparing 9019 for filing (.4); review and revise motion to seal and order granting same (.6).	1.00
06/07/2023	V. Driver	B185/	Continue emails on exhibits to motion to reject hearing with UCC counsel.	0.30

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Responsible Attorney
Vickie L. Driver

Post - petition

06/07/2023	V. Driver	B190/	Review and revise settlement offer per internal comments and circulate to team for review and further comment (1.1); sending motion to seal and order to FSS counsel for review and approval for filing in FSS case (.2); review and revise affidavit in support of MSJ responses (.9); emails with litigation team to discuss revisions (.3); call to discuss affidavit contents and brief status (.7); reviewing clips referenced by plaintiffs MSJs (.7); emails with B. Schleizer on affidavit changes and open issues to discuss with client (.5).	4.40
06/07/2023	M. Figueroa	B190/	Review and evaluate extensive client documents in response to UCC's 2004 requests for production.	0.60
06/07/2023	A. Finch	B190/	Review documents for production to UCC (in response to 2004 requests).	0.30
06/07/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 6 Tuesday (4.0); summarize statements made related to case (.3).	4.30
06/07/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	7.50
06/07/2023	D. McClellan	B190/	Draft affidavit in support of motion for summary judgment.	2.60

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06/07/2023	C. Stephenson	B185/	Review and analyze UCC Objection to ESG Emergency Motion.	1.20
06/07/2023	C. Stephenson	B190/	Review and revise settlement proposal (1.1); draft related correspondence (.3).	1.40
06/07/2023	C. Stephenson	B190/	Review and revise declaration in support of MSJ response (1.3); review and respond to related correspondence (.8); perform analysis regarding same (.8).	2.90
06/07/2023	E. Weaver	B190/	Revise and finalize motion for approval of compromise and settlement under FRP 9019, along with proposed agreed order (.6); draft motion to seal exhibit A to agreed order and corresponding proposed order to same (1.4).	2.00
06/07/2023	R. Yates	B190/	Cite check and edit brief.	1.80
06/07/2023	R. Yates	B190/	Edit brief.	1.60
06/07/2023	R. Yates	B190/	Review and analyze brief (1.6); create list of additions and edits. (.3)	1.80
06/07/2023	R. Yates	B190/	Continue to draft response to statement of undisputed material facts (2.6); review record regarding the same. (1.3)	3.60
06/07/2023	J. Yoon	B190/	Draft and revise the response to Connecticut tort claimants' motion for summary judgment.	2.30

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06/07/2023	J. Yoon	B190/	Analyze, review, and revise the debtor's declaration in support of his response to summary judgment motions.	0.50
06/08/2023	C. Craig	B190/	Review and analyze extensive client documents in response to UCC requests.	5.50
06/08/2023	L. Dauphin	B190/	Apply redactions to billing narratives in preparation of production.	2.40
06/08/2023	V. Driver	B140/	Begin drafting ESG demand letter regarding assertion of owning Platinum inventory.	0.20
06/08/2023	V. Driver	B190/	Emails with team analyzing cases and discussing strategy for MSJ responses (.9); review cases on MSJ regarding non-dischargeability and collateral estoppel issues (.8); calls with client reviewing affidavit (.9); emails with trial team on affidavit changes and edits (1.1).	3.70
06/08/2023	V. Driver	B210/	Emails seeking update on deposition sought with UCC to ESG motion to quash (.1); attend hearing on motion to quash (1.1); discuss results of hearing with client and team (.6).	1.80
06/08/2023	M. Figueroa	B190/	Review and evaluate extensive client documents in response to UCC's 2004 requests for production.	2.30

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06/08/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 7 Wednesday (4.0); summarize statements made related to case (.1).	4.10
06/08/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment.	13.90
06/08/2023	C. Stephenson	B190/	Calls and correspondence regarding client declaration (3.8); analyze statement of undisputed material facts and objections to same (2.8); draft analysis and general comments regarding briefing (1.8); review draft CT response (2.2).	10.60
06/08/2023	E. Weaver	B120/	Review objection to debtor's motion to reject executory contract and Professional Services Agreement with Elevated Solutions Group, LLC (.4); draft demand letter to counsel for ESG regarding provisions of the agreement (.8).	1.20
06/08/2023	R. Yates	B190/	Edit brief (5.0); conduct legal research (1.0); discuss remaining legal and factual issues (1.0); restructure arguments in accordance with team meetings (1.0); advise on other briefing (1.9).	9.90

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06/08/2023	J. Yoon	B190/	Draft and revise the fact section of the response to Connecticut tort claimants' motion for summary judgment (1.7); analyze and review Connecticut state court record for in preparation to draft fact section of the brief and the affidavit (2.4).	4.10
06/08/2023	J. Yoon	B190/	Analyze and review Connecticut and Texas tort claimants' summary judgment evidence and statements of facts in preparation to incorporate facts into the debtor's declaration not already submitted as summary judgment evidence.	2.30
06/09/2023	L. Dauphin	B190/	Continue to apply redactions and prepare client document production for attorney review and approval.	1.90
06/09/2023	J. Davis	B190/	Review and analyze Texas MSJ Response.	3.50
06/09/2023	J. Davis	B190/	Review and analyze Connecticut MSJ Response.	4.00

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06/09/2023	V. Driver	B190/	<p>Begin review of TX MSJ response and initial comments to initial draft (2.8); analyze need for objection to statement of undisputed facts and contents of same (1.7); discuss strategy for first amendment argument revision (.7); discuss relevant issues with team (1.1); review offer support and revisions to same with financial advisors (.8); email with mediator regarding timing on settlement offer (.2); analyze additional comments to draft offer (.3); finalize offer and send to mediator and SubV trustee (.4); review issues with production and discuss same with team (.8); emails regarding scheduling depositions and topics for 2004 with Debtor and B. Schliezer (.8); call with trial team on 2004 issues (.3); emails with parties to 9019 and committee confirming no objection to sharing unredacted Exhibit A to 9019. (1.5)</p>	11.40
06/09/2023	V. Driver	B210/	<p>Call with S. Brauner to discuss interim compensation increase terms (.4); emails with accounting regarding setting up escrow and report same to UCC (.2); review email regarding moving domain registry and send to B. Schleizer for review. (.3)</p>	0.90

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06/09/2023	D. McClellan	B190/	Draft response to Texas plaintiffs' motion for summary judgment	14.90
06/09/2023	T. Smith	B190/	Review documents being produced for discovery for necessary redactions	2.50
06/09/2023	C. Stephenson	B190/	Review and revise Responses and Objections to Plaintiffs' Motion for Summary Judgment (6.3); review and revise settlement offer (.5); review and respond to various discovery correspondence (1.3).	8.10
06/09/2023	E. Weaver	B190/	Serve via email unredacted Exhibit A to agreed 9019 order to Sara Brauner, Jennifer Hardy, Avi Mosenberg and Jarrod Martin.	0.10
06/09/2023	R. Yates	B190/	Incorporate suggestions to changes in the draft from the litigation and bankruptcy teams	0.90
06/09/2023	R. Yates	B190/	Coordinate exhibits to attach to response brief.	0.50
06/09/2023	R. Yates	B190/	Coordinate objection to evidentiary material.	0.20
06/09/2023	R. Yates	B190/	Format legal citations in brief.	1.20
06/09/2023	R. Yates	B190/	Discuss final issues to address in brief in response to summary judgment with co-counsel	0.60
06/09/2023	R. Yates	B190/	Edit, cite check, modify brief.	1.90

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06/09/2023	J. Yoon	B190/	Analyze summary judgment motion and evidence of both Texas and Connecticut tort claimants to strategize motion to strike/objection to summary judgment evidence.	0.20
06/09/2023	J. Yoon	B190/	Analyze and review document production batch for redaction and responsiveness to UCC's Rule 2004 examination document requests (3.1); draft email to UCC's counsel regarding potential privacy issue and delay due to same (0.5).	3.60
06/09/2023	J. Yoon	B190/	Draft and revise Objection and Response to Plaintiffs' Statement of Undisputed Material Facts against Connecticut and Texas summary judgment motions (1.6); analyze and review the tort claimants' statements of undisputed material facts in preparation to draft objections (2.5).	4.10
06/10/2023	V. Driver	B190/	Review and revise TX brief (4.1); call with team to discuss structural changes needed for final versions (.8).	4.90
06/10/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 8 Thursday (4.0); summarize statements made related to case (.1).	4.10

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06/10/2023	D. McClellan	B190/	Draft and revise response to Texas plaintiffs' motion for summary judgment.	12.50
06/10/2023	C. Stephenson	B190/	Review and revise Response and Objection to CT MSJ (6.4); calls and correspondence regarding same (1.3).	8.10
06/10/2023	R. Yates	B190/	Edit drafts to brief (3.5); review drafts (1.0); attend team meetings (1.4).	5.90
06/10/2023	J. Yoon	B190/	Draft Statements of Undisputed Material Facts for the debtor's response to Texas tort claimants' summary judgment motion (2.7); draft Objection and Response to Texas tort claimants' Statement of Undisputed Material Facts (4.1); draft Statements of Undisputed Material Facts for the debtor's response to Connecticut tort claimants' summary judgment motion (2.4); draft Objection and Response to Connecticut tort claimants' Statement of Undisputed Material Facts (3.9).	13.10
06/10/2023	J. Yoon	B190/	Analyze, review, and strategize briefing strategy to ensure no assignments overlap between members and all parts of the briefs are assigned to drafters.	0.80

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06/11/2023	V. Driver	B190/	Review and revise CT brief and send email to team with comments and questions (3.6); review and revise TX brief and send comments to team (3.1).	6.70
06/11/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 9 Friday (4.0); summarize statements made related to case (.1).	4.10
06/11/2023	D. McClellan	B190/	Draft and revise response to Texas plaintiffs' motion for summary judgment.	10.60
06/11/2023	C. Stephenson	B190/	Review and revise Draft Responses and Objections to TX and CT MSJs (9.8); review and respond to related correspondence (2.8).	12.60
06/11/2023	R. Yates	B190/	Draft, revise, edit, comment on several drafts of briefs, statements, and points of law for final response to summary judgment.	6.60
06/11/2023	J. Yoon	B190/	Draft and revise response to Texas tort claimants' summary judgment motion and fix all citations to conform to Bluebook and Greenbook (6.6); revise the debtor's declaration in support of the same (0.7).	7.30

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06/12/2023	N. Collins	B240/	Analyze tax treatment of a potential settlement and associated legal fees (2.9); call with outside advisors regarding hypothetical settlement structure (.9); commence drafting memorandum with IRS authority regarding same (.9).	4.70
06/12/2023	L. Dauphin	B190/	Continue to apply redactions to billing narratives in preparation of production.	0.50
06/12/2023	J. Davis	B190/	Work on final review of brief in opposition to Texas plaintiffs MSJ on dischargeability (2.5); work helping to organize exhibits (1.5).	4.00
06/12/2023	J. Davis	B190/	Work on final review of brief in opposition to Connecticut plaintiffs MSJ on dischargeability (2.5); work helping to organize exhibits (1.5).	4.00
06/12/2023	V. Driver	B190/	Review and revise TX brief (3.4); call with briefing team on brief revision status and analyzing last minute structural changes (1.1); review and revise objections to evidence and SUMF (2.1); draft conclusion (1.2); review and revise conclusion (.8); correspondence regarding Debtor deposition parameters and dates (.3).	8.90
06/12/2023	V. Driver	B240/	Emails regarding Guadalupe County appraisal notice.	0.20

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06/12/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 11 Sunday (2.0); summarize statements made related to case (.2).	2.20
06/12/2023	A. Finch	B210/	Review and analyze client's guest appearance on Louder with Crowder on June 7 (1.1); summarize statements made related to case (.1).	1.20
06/12/2023	A. Finch	B210/	Review and analyze client's guest appearance on Louder with Crowder on June 6 (1.2); summarize statements made related to case (.1).	1.30
06/12/2023	D. McClellan	B190/	Revise responses to Texas and Connecticut plaintiffs' motions for summary judgment.	9.30
06/12/2023	D. McClellan	B190/	Revise affidavit filed in support of response to Texas and Connecticut plaintiffs' motions for summary judgment.	1.50
06/12/2023	D. McClellan	B190/	Revise responses to Texas and Connecticut plaintiffs' statement of uncontested material facts.	2.50
06/12/2023	D. McClellan	B190/	Develop strategy regarding responses to Texas and Connecticut plaintiffs' motions for summary judgment.	0.50

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06/12/2023	C. Stephenson	B190/	Review and analyze exhibits (4.2); review and revise draft responses and objections (7.9); calls and conferences regarding same (1.5).	13.60
06/12/2023	E. Weaver	B190/	KeyCite and case pull of In re Scarborough, 516 B.R. 897 (Bankr. W.D. 2014).	0.20
06/12/2023	E. Weaver	B190/	Review draft of Texas response to motion for summary judgment for definitions and prepare list of same.	2.80
06/12/2023	R. Yates	B190/	Continue to monitor drafts, make edits, coordinate reviews of final draft of response to summary judgment.	4.10
06/12/2023	J. Yoon	B190/	Analyze, review, and strategize current briefing progress and assignments required for filing and not duplicate work.	0.70
06/12/2023	J. Yoon	B190/	Revise the debtor's declaration (0.5); draft and prepare signature blocks, certificates of services, and exhibits of the response briefs and the Objections and Responses to the tort claimants' Statement of Undisputed Material Facts against both Texas and Connecticut tort claimants' summary judgment motion (0.6); draft and revise response to Connecticut tort claimants' summary judgment motion and finalize citations to conform to Bluebook (8.3).	9.40

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06/13/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	3.20
06/13/2023	J. Davis	B190/	Final review of both MSJ response briefs and exhibits before filing.	2.00
06/13/2023	V. Driver	B190/	Work on brief responding to motion for summary judgment in TX non-dischargeability action and prepare for filing (3.9); call with client reviewing revised affidavit in support of both responses to MSJs in TX and CT (.6); final approval from client over text (.3); review edits to objections to MSJ evidence and statements of undisputed material fact (.7); review and analyze conclusion comments (.8).	6.30
06/13/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 12 Monday (4.0); summarize statements made related to case (.2)	4.20
06/13/2023	D. McClellan	B190/	Revise responses to Texas and Connecticut plaintiffs' motions for summary judgment and prepare for filing	8.90

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06/13/2023	T. Rinck	B190/	Draft and build comprehensive Table of Contents and Table of Authorities to include an index of all case citations in support of Defendant Alexander E. Jones' Objection and Response to Movants' Motion for Summary Judgment (Doc. 27), indexing 53-page Objection and Response.	3.40
06/13/2023	T. Rinck	B190/	Draft and build comprehensive Table of Contents and Table of Authorities to include an index of all case citations in support of Defendant Alexander E. Jones' Objection and Response to Movants' Motion for Summary Judgment (Doc. 58), indexing 43-page Objection and Response.	2.90
06/13/2023	C. Stephenson	B190/	Review and revise Responses and Objections to Motions for Summary Judgment and Objections to Exhibits and Statements of Uncontested Facts (8.3); review and respond to related correspondence (2.1).	10.40

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06/13/2023	E. Weaver	B190/	Revise, finalize and file defendant's response to movant's motion for summary judgment in both adversary proceedings (4.4); serve same via email to parties-in-interest for each adversary (.5); search for email addresses for parties-in-interest in the Wheeler adversary (.4).	5.30
06/13/2023	R. Yates	B190/	Confer with Deric J. McClellan regarding final edits to summary judgment response brief to ensure consistency	0.60
06/13/2023	J. Yoon	B190/	Revise response briefs, statements of undisputed facts, and objections and responses to tort claimants' statements of undisputed facts and finalize for filing and service for both the Texas and Connecticut tort claimants' summary judgment motions.	7.70
06/14/2023	V. Driver	B130/	Correspondence regarding potential of auctioning off personal items to receive higher value.	0.70

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06/14/2023	V. Driver	B140/	Email seeking clarification of estimates regarding AJ and FSS in Fontaine where AJ has been dismissed. (.3) Analyzing affidavit from B. Schleizer needed in support of 9019 (.3); call with J. Hardy on modifications of 9019 orders requested by Judge. (.4) Clarifying need for B. Schleizer affidavit in support of 9019. (.1)	1.10
06/14/2023	V. Driver	B160/	Sending Martin firm invoices to AJ notice parties for May fees. (.2)	0.20
06/14/2023	V. Driver	B190/	Correspondence regarding draft counteroffer (.5); emails regarding production protocol revisions needed to prevent disclosure of personal information (.4); emails to accounting to set up escrow account for pro fee escrow (.2); review and analyze information needed in 2004 to committee (3); draft correspondence with PQPR on settlement status (.1).	1.50
06/14/2023	V. Driver	B195/	Travel to and from Austin for meetings with client and P. McGill (5.6) [billed at half-time]	2.80

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06/14/2023	V. Driver	B210/	Analyze need for motion to approve post-petition contracts (.6); meeting with R. Battaglia and P. McGill on status of FSS operations (1.2); call with R. Battaglia on various FSS matters (.7); review status of Youngevity demands for accounting and contracts (.3); review and revise stipulation provisions for resolution to employment agreement modification (9).	3.70
06/14/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 13 Tuesday (4.0); summarize statements made related to case (.3).	4.30
06/14/2023	C. Stephenson	B120/	Review and respond to multiple correspondence regarding estate efforts to centralize and recover estate assets (1.8); conferences regarding same (.7).	3.80
06/14/2023	C. Stephenson	B140/	Calls and correspondence regarding hearing and related matters.	1.40
06/14/2023	E. Weaver	B190/	Procure Schleizer declaration and file-stamped copy of 9019 motion and circulate to team.	0.40

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06/14/2023	J. Yoon	B140/	Draft and revise Declaration of Robert Schleizer in Support of Debtors' Motion for Approval of Compromise and Settlement under Federal Rule of Bankruptcy Procedure 9019 (2.1); review motion for approval of compromise and settlement under Federal Rule of Bankruptcy Procedure 9019 in preparation to draft declaration in support (1.1); review pertinent correspondences and cost estimate of Fertitta Reynal LLP to incorporate into Declaration of Robert Schleizer (0.8).	4.00
06/15/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive documents in response to requests for production by the UCC. [NO CHARGE]	0.60
06/15/2023	C. Craig	B190/	Develop strategy for obtaining materials responsive to UCC 2004 requests. [NO CHARGE]	0.30
06/15/2023	C. Craig	B190/	Review and analyze extensive documents in response to requests for production by the UCC.	4.00
06/15/2023	L. Dauphin	B190/	Prepare supplemental client document production.	0.10
06/15/2023	V. Driver	B110/	Draft strategic list of items to accomplish in case and analyze staffing to accomplish tasks timely.	1.10

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06/15/2023	V. Driver	B140/	Review and revise ESG demand letter (.7); review contracts between ESG and FSS and AJ for support of the demand letter (.4); review comments and prepare for sending (.1).	1.20
06/15/2023	V. Driver	B160/	Analyze best practices on partial monthly fee statement and deadlines in interim compensation order and respond to BlackBriar on same. (.3)	0.30
06/15/2023	V. Driver	B170/	Correspondence with B. Schleizer on Teneo fee analysis.	0.30
06/15/2023	V. Driver	B190/	Call with Mediator on settlement terms (.8); call with B. Schleizer on call results (.4); call with client and B. Schleizer on mediator call results (.9).	2.10
06/15/2023	V. Driver	B190/	Emails on AJ deposition dates (.1); emails regarding payment for phone repair/data restoration (.2); emails on Contini invoices and breach of document request and analysis of presenting invoices. (.4)	0.70

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06/15/2023	V. Driver	B210/	Call on review protocol for remaining data to be produced (.8); emails to team members on same (.2); emails updating on stipulation on employment agreement progress (.2); review and revise motion to approve book contracts (.9); review book contracts confidentiality provisions and evaluate portions for redaction (.7); emails with agency and to publisher on sealing details (.2).	3.00
06/15/2023	A. Finch	B190/	Revise Production Protocol re: 2004 requests.	0.90
06/15/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 13 Wednesday (4.0); summarize statements made related to case (.2).	4.20
06/15/2023	T. Smith	B190/	Multiple emails with team to discuss production protocol and conference call scheduling.	0.20
06/15/2023	C. Stephenson	B120/	Draft Motion to Approve Book Contracts and related correspondence.	1.80
06/15/2023	C. Stephenson	B140/	Review and revise Violation of Automatic Stay Letter and related correspondence.	1.60
06/15/2023	C. Stephenson	B160/	Calls and correspondence regarding employment engagement for N. Pattis.	1.30

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06/15/2023	E. Weaver	B190/	Pull Scarborough case and review keycites for same for the response to motion for summary judgment.	0.30
06/15/2023	E. Weaver	B190/	Draft demand letter to Johnnie Patterson regarding ESG contract.	1.00
06/15/2023	J. Yoon	B160/	Draft and revise application to hire Norm Pattis (1.9); analyze and review filings regarding Norm Pattis in the FSS bankruptcy (1.5).	3.40
06/15/2023	J. Yoon	B170/	Call with Robert Schleizer regarding Teneo fee objections analysis (0.3); review and analyze Teneo's first three fee statements (0.2).	0.50
06/15/2023	J. Yoon	B190/	Analyze and strategize email review protocols in response to UCC's Rule 2004 Examination.	0.30
06/16/2023	C. Craig	B190/	Develop strategy for obtaining materials responsive to UCC 2004 requests. [NO CHARGE]	0.30
06/16/2023	C. Craig	B190/	Develop strategy for production of documents to the UCC in response to 2004 requests. [NO CHARGE]	0.70
06/16/2023	C. Craig	B190/	Review and analyze extensive documents in response to requests for production by the UCC.	3.00
06/16/2023	C. Craig	B190/	Prepare documents for production to the UCC.	0.30

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06/16/2023	C. Craig	B190/	Draft correspondence to UCC regarding document production by Debtor.	0.30
06/16/2023	L. Dauphin	B190/	Prepare Contini invoices received from Blackbriar for attorney review and redactions.	0.10
06/16/2023	V. Driver	B110/	Review and approve exemption objection extension stipulation and send email to UCC on same.	0.40
06/16/2023	V. Driver	B170/	Review and analyze analysis of Teneo monthly statements for sending objection under Interim Compensation Order (.6); review and revise email objection and send to notification parties (.4); emails with UCC counsel on objections to Teneo monthly fee statements (.3).	1.30
06/16/2023	V. Driver	B185/	Emails with agency and to publisher on sealing details.	0.80
06/16/2023	V. Driver	B190/	Emails on scheduling E. Jones deposition (.2); call with L. Freeman about settlement terms (.7); review and analyze settlement terms (.4).	1.30

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06/16/2023	V. Driver	B210/	Analysis of removal of lawsuit and potential violation of the discharge injunction (.7); review and initially analyze draft stipulation on employment agreement (.4); begin compiling listing of non exempt jewelry to be sold per stipulation with UCC (.2); call with R. Battaglia on status of all matters with FSS and settlement issues (.7).	2.10
06/16/2023	M. Figueroa	B190/	Conference call regarding document review/production and specific search terms.	0.50
06/16/2023	A. Finch	B110/	Revise Production Protocol re: 2004 requests.	0.60
06/16/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 14 Thursday (4.0); summarize statements made related to case (.3).	4.30
06/16/2023	T. Smith	B190/	Conference call with team to discuss document review and production protocol.	0.50
06/16/2023	C. Stephenson	B160/	Review and revise Application to Employ N. Pattis and supporting pleadings.	1.80
06/16/2023	C. Stephenson	B210/	Review and comment on stipulation and resolution language regarding employment agreement.	1.20
06/16/2023	C. Stephenson	B320/	Draft plan related correspondence.	2.30

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Vickie L. Driver

Post - petition

06/16/2023	E. Weaver	B140/	Review case docket entry continuing hearing on motion for relief from stay and docket new hearing date for same.	0.20
06/16/2023	E. Weaver	B210/	Draft motion for entry of an order authorizing debtor to file existing book contract and new contract under seal, along with proposed order.	2.20
06/16/2023	J. Yoon	B160/	Draft and finalize employment application to hire Norm Pattis.	3.10
06/16/2023	J. Yoon	B170/	Analyze and review the interim Compensation Procedure order regarding how to notice objection to fees (0.4); draft analysis email regarding objections to certain portions of Teneo's fees (1.2); draft and review email to UCC regarding objections to Teneo's fees (1.5).	3.10
06/16/2023	J. Yoon	B190/	Analyze, review, and strategize production protocols for next batch of document production in response to UCC's Rule 2004 examination.	0.60
06/17/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 15 Friday (4.0); summarize statements made related to case (.2).	4.20
06/19/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC. [NO CHARGE]	3.00

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Vickie L. Driver

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06/19/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	1.50
06/19/2023	V. Driver	B110/	Emails seeking clarification on schedules and statements amendments.	0.30
06/19/2023	V. Driver	B140/	Emails with A. Reynal on billings for De La Rosa and Fontaine matters.	0.30
06/19/2023	V. Driver	B160/	Emails with litigation counsel interim comp procedures.	0.20
06/19/2023	V. Driver	B170/	Call with committee counsel to discuss Teneo fee deferral.	0.80
06/19/2023	V. Driver	B190/	Emails seeking confirmation of dates for depositions and scheduling same.	0.30
06/19/2023	V. Driver	B210/	Discuss initiative to seek budget from litigators in TX to project expense in budget (.2); emails on redactions needed on book contracts to fulfill confidentiality provisions (.6).	0.80
06/19/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 18 Sunday (2.0); summarize statements made related to case (.1)	2.10
06/19/2023	T. Smith	B190/	Review, redact and code documents for production	2.20

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06/19/2023	T. Smith	B190/	Review and redact documents as needed	4.00
06/19/2023	T. Smith	B190/	Telephone call with Caylin C. Craig to discuss production and redaction.	0.20
06/19/2023	C. Stephenson	B160/	Review and revise draft application and declaration (1.6); draft related correspondence (.3); perform analysis regarding various estate professionals interim compensation issues (.8).	2.70
06/19/2023	C. Stephenson	B185/	Review and respond to correspondence regarding contract redaction matters.	0.80
06/19/2023	C. Stephenson	B190/	Draft and review correspondence regarding trial theory/strategy.	1.60
06/19/2023	E. Weaver	B160/	Email correspondence to and from Chrystal Madden regarding interim fee applications.	0.20
06/19/2023	E. Weaver	B190/	Draft debtor's 2004 examination for the UCC.	2.00
06/20/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	1.50
06/20/2023	L. Dauphin	B190/	Prepare supplemental client document production.	0.30
06/20/2023	V. Driver	B160/	Emails with S. Jordan on co-counsel coordination.	0.20
06/20/2023	V. Driver	B170/	Review summary from UCC on Teneo compromise and email to clarify same (.4); call with B. Schleizer to discuss Teneo offer (.3).	0.70

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06/20/2023	V. Driver	B210/	Redacting book contract and sending to publisher and agent for review and approval (.8); review comments and redact additional provisions accordingly (.3); review and revise book contract approval motion (.7).	1.80
06/20/2023	T. Smith	B190/	Review, redact and code documents in response to document request	7.30
06/20/2023	C. Stephenson	B160/	Correspondence regarding Application to Employ N. Pattis (.4); review and finalize application, declaration and proposed order (1.3).	1.70
06/20/2023	C. Stephenson	B190/	Review and analyze settlement proposal (.9); draft related correspondence (.8).	1.70
06/20/2023	C. Stephenson	B190/	Review and analyze discovery issues and related correspondence.	1.40
06/20/2023	C. Stephenson	B310/	Perform analysis and draft correspondence regarding administrative claims.	1.30
06/20/2023	E. Weaver	B160/	Revise, finalize and file application to employ Pattis & Smith, LLC, along with supporting declaration for same (.5); serve via email to the trustee and UCC (.2); docket objection deadline for same (.1).	0.80

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06/20/2023	R. Yates	B190/	Review and analyze final summary judgment response to prepare for hearing and possible appeal	1.60
06/20/2023	J. Yoon	B160/	Coordinate with Norm Pattis regarding his employment application and revising the application as requested.	1.90
06/20/2023	J. Yoon	B160/	Draft and revise the Declaration of Norman A. Pattis to be attached to the Employment Application of the same.	0.50
06/21/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	3.00
06/21/2023	V. Driver	B190/	Emails regarding place and time for depositions.	0.50
06/21/2023	T. Smith	B190/	Review and redact documents in response to document request from creditor's committee	3.00
06/21/2023	C. Stephenson	B160/	Review and revise certificates of no objection and proposed orders for professional fee applications.	1.60
06/21/2023	C. Stephenson	B310/	Draft correspondence regarding Youngevity matters.	1.10
06/21/2023	C. Stephenson	B310/	Perform analysis and draft correspondence regarding administrative claims.	1.30
06/21/2023	E. Weaver	B110/	Compile monthly operating reports in the FSS case and circulate fileshare link to team.	1.00

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06/21/2023	E. Weaver	B160/	Review case docket (.1); draft, finalize and file certificates of no objection to the first interim fee applications of Crowe & Dunlevy, Blackbriar Financial Advisors and Rachel Kennerly (1.3); prepare proposed order for same (.6).	2.00
06/21/2023	J. Yoon	B120/	Analyze correspondences and documents related to Youngevity in preparation to draft Rule 2004 examination of Youngevity for its contracts with Free Speech Systems and the debtor.	2.30
06/22/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	3.00
06/22/2023	L. Dauphin	B190/	Run pre-production quality checks.	0.60
06/22/2023	V. Driver	B190/	Review email on producing document and respond to same.	0.10
06/22/2023	V. Driver	B210/	Draft correspondence regarding revised redactions and seeking approval for filing (.2); call with T. Wulff on whiskey deal terms (.4); email seeking FTC expert and emails with same (.3).	0.90
06/22/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 19 Monday (4.0); summarize statements made related to case (.1)	4.10

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Vickie L. Driver

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06/22/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 20 Tuesday (4.0); summarize statements made related to case (.1)	4.10
06/22/2023	C. Stephenson	B160/	Review and respond to interim compensation inquiry from estate professional.	0.40
06/22/2023	E. Weaver	B160/	Draft and file certificate of no objection regarding first interim fee application of Crowe & Dunlevy, BlackBriar Financial Advisors and Rachel Kennerly.	1.30
06/22/2023	E. Weaver	B190/	Review bank statements produced to the UCC in February (.2); email correspondence to and from Blackbriar regarding missing BoFA statements for November, 2022 (.3).	0.50
06/22/2023	J. Yoon	B120/	Draft and revise Rule 2004 examination of Youngevity regarding production of documents responsive to contracts or contract correspondences with Free Speech Systems or the debtor.	3.30
06/23/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC	1.00
06/23/2023	C. Craig	B190/	Draft correspondence to UCC regarding document production by Debtor	0.30

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06/23/2023	L. Dauphin	B190/	Finalize pre-production review and prepare supplemental client document production.	1.40
06/23/2023	V. Driver	B160/	Call with UST on Norm Pattis employment and issues with Teneo fees.	0.90
06/23/2023	V. Driver	B210/	Call with FSS counsel on various operational issues.	1.10
06/23/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 21 Wednesday (4.0); summarize statements made related to case (.2).	4.20
06/23/2023	E. Weaver	B160/	ECF case management of orders granting first interim fee applications of Crowe & Dunlevy, BlackBriar Advisors, Rachel Kennerly and Jordan & Ortiz.	0.30
06/23/2023	E. Weaver	B160/	Submit and file proposed orders granting first interim fee applications for Crowe & Dunlevy, BlackBriar Financial Advisors and Rachel Kennerly.	0.40
06/24/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 22 Thursday (4.0); summarize statements made related to case (.3).	4.30

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Vickie L. Driver

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06/25/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 23 Friday (4.0); summarize statements made related to case (.2).	4.20
06/26/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	2.50
06/26/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	0.70
06/26/2023	V. Driver	B190/	Correspondence with UCC regarding deposition and document production status.	1.00
06/26/2023	V. Driver	B210/	Emails with R. Battaglia regarding timing to file motion to approve employment agreement (.1); call with B. Schleizer regarding client trip for family emergency and needs for remote show production budget (.4).	0.50
06/26/2023	A. Finch	B110/	Review series of emails with UCC regarding 2004 production/requests (.3); review and Revise Production protocol (.3).	0.60

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06/26/2023	A. Finch	B210/	Review and analyze client's existing platform content, InfoWars: Ep. 2023 June 25 Sunday (2.0); summarize statements made related to case (.1).	2.10
06/26/2023	A. Sokolosky	B190/	Conference to discuss document production and discovery project.	0.90
06/26/2023	C. Stephenson	B190/	Perform analysis regarding settlement strategy (1.8); discuss staffing needs for various case matters (.7).	2.50
06/27/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	2.50
06/27/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	0.50
06/27/2023	L. Dauphin	B190/	Conference call regarding document review protocol and process.	0.50
06/27/2023	L. Dauphin	B190/	Research in preparation of review team conference call.	1.10
06/27/2023	L. Dauphin	B190/	Apply redactions to attorney narratives and personal identifiable information.	1.50

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06/27/2023	V. Driver	B140/	Call with TX claimants discussing presentation in support of 9019 (.5); review and approve W&E list for 9019 motion (.5).	1.00
06/27/2023	V. Driver	B170/	Email with UST on Teneo fee issues.	0.10
06/27/2023	V. Driver	B190/	Call regarding document production matter (.4); call with document production team on progress on review and production (.8); review and revise settlement offer and send to group (.9); call with B Schleizer on settlement offer and defining income post-tax (.5).	2.60
06/27/2023	V. Driver	B210/	Emails seeking to set time to talk regarding influencer status as owner and FTC regulations.	0.30
06/27/2023	A. Finch	B110/	Review and Revise Production protocol.	0.60
06/27/2023	A. Sokolosky	B190/	Conference regarding document production and production protocol.	0.60
06/27/2023	A. Sokolosky	B190/	Perform analysis on preparation for document production.	2.80
06/27/2023	C. Stephenson	B190/	Analysis regarding settlement offer and related correspondence.	1.30
06/27/2023	E. Weaver	B110/	Begin drafting third amended schedules A/B and C (1.7); prepare email correspondence to Blackbriar regarding items requiring additional information. (.3)	2.00

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06/27/2023	E. Weaver	B190/	Draft witness & exhibit list and file with the court (.7); compile pleadings for hearing notebooks for the hearings in both the AJ and FSS cases on 06-29-2023 (1.4).	2.10
06/27/2023	J. Yoon	B190/	Analyze and strategize document review and production protocol in response to UCC's Rule 2004 examination request.	0.70
06/28/2023	C. Craig	B190/	Develop strategy for reviewing and analyzing extensive client documents in response to requests by UCC and providing responses to requests for additional information from UCC. [NO CHARGE]	0.50
06/28/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	1.50
06/28/2023	L. Dauphin	B190/	Apply redactions to attorney narratives and personal identifiable information.	0.70
06/28/2023	V. Driver	B140/	Review and analyze ROR filed by CT and emails TX regarding same (.8); call with TX regarding ROR and terms of 9019. (.7)	1.50
06/28/2023	V. Driver	B170/	Emails with J. Ruff on Teneo resolution with UCC (.1); emails on Teneo fees and reserving identified portion until fee application. (.3)	0.40

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06/28/2023	V. Driver	B195/	Travel to Houston for hearings (billed at half time) (4.0).	2.00
06/28/2023	C. Stephenson	B310/	Review and revise Application for Administrative Expenses (.7); draft correspondence to R. Battaglia regarding same (.2).	0.90
06/29/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	4.50
06/29/2023	L. Dauphin	B190/	Apply redactions to attorney narratives and personal identifiable information.	1.10
06/29/2023	V. Driver	B110/	Emails with co-counsel on case status.	0.30
06/29/2023	V. Driver	B140/	Review invoicing from initial TX trial in advance of hearing on 9019 (.3); preparation for and attend hearing on 9019 to resolve stay motion with TX tort claimants (1.2); draft proffer for witness to support 9019 (.8); review and revise supporting declaration (.4).	2.70
06/29/2023	V. Driver	B185/	Emails seeking latest redactions on book contract for motion to approve.	0.20

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06/29/2023	V. Driver	B190/	Strategy regarding 2004 discovery from Youngevity for documents relating to agreements with AJ and related entities (.2); attend meeting with Sub V Trustee, McGill, Battaglia, and TX Tort Claimants on settlement (2.1); emails scheduling depositions (.2); emails on settlement offer and support for values in exhibit A (.2); emails on status of document production. (.8)	3.50
06/29/2023	V. Driver	B195/	Travel from Houston (billed at half time) (4.0)	2.00
06/29/2023	C. Stephenson	B140/	Analysis and correspondence regarding Motion for Willful Violation of Automatic Stay.	0.90
06/29/2023	C. Stephenson	B140/	Attend Lift Stay Hearing (.8); review and respond to related correspondence (.8).	1.60
06/29/2023	C. Stephenson	B185/	Analyze issues regarding Motion to approve Book Contracts.	1.10
06/30/2023	C. Craig	B190/	Review and analyze extensive client documents in response to requests by UCC.	1.00
06/30/2023	L. Dauphin	B190/	Complete pre-production quality and coding review (.6); prepare supplemental client document production (.6).	1.20
06/30/2023	V. Driver	B140/	Organizing call to discuss upcoming stay relief deadlines and trial budgeting.	0.30

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Vickie L. Driver

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06/30/2023	V. Driver	B190/	Emails with tort claimant counsel regarding briefing deadline extension.	0.30
06/30/2023	V. Driver	B210/	Emails seeking payment of employment agreement salary increase after approval retroactive to June 1. (.2); emails regarding employment agreement confidentiality and attaching to admin expense application. (.3)	0.50
06/30/2023	C. Stephenson	B310/	Review and revise administrative claims application and proposed order (2.8); draft and review related correspondence (.6).	3.40
06/30/2023	E. Weaver	B310/	Revise and finalize Alex Jones' motion for allowance for administrative expense claim (.7); prepare proposed order for same (.6).	1.30

Total Hours	<u>797.40</u>
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Total Fees for this Invoice

\$341,392.00

SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B110	8.70	3,643.50	Bankruptcy - Case Administration
B120	12.40	5,954.00	Bankruptcy - Asset Analysis and Recovery
B130	1.00	795.00	Bankruptcy - Asset Disposition

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SUMMARY OF TASKS

Task	Hours	Amount	Task Description
B140	20.60	13,797.00	Bankruptcy - Relief from Stay/Adequate Protection Proceedings
B160	26.60	13,198.00	Bankruptcy - Fee/Employment Applications
B170	27.10	6,036.00	Bankruptcy - Fee/Employment Objections
B185	4.90	3,547.50	Bankruptcy - Assumption/Rejection of Leases and Contracts
B190	561.00	232,834.50	Bankruptcy - Other Contested Matters (excluding assumption/rejection motions)
B195	6.80	5,406.00	Bankruptcy - Non-Working Travel
B210	110.60	44,297.00	Bankruptcy - Business Operations
B240	5.80	4,047.00	Bankruptcy - Tax Issues
B310	9.60	6,192.00	Bankruptcy - Claims Administration and Objections
B320	2.30	1,644.50	Bankruptcy - Plan and Disclosure Statement (including Business Plan)
Total	797.40	\$341,392.00	

06/09/2023 VENDOR: Stephenson, Christina; INVOICE#: 761232; DATE: 6/9/2023 - CS; reimbursement for expenses for working lunch and travel expense for San Antonio Conference

\$101.67

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Vickie L. Driver

Post - petition

06/15/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for meeting at clients office 6/14/2023; transportation \$ 62.31	62.31
06/16/2023	Driver , Vickie reimbursement of travel expense to Austin Texas for meeting at client's Office 6/14/2023; transportation \$ 365.53	365.53

Subtotal of Expenses	<u>\$529.51</u>
Subtotal of Costs	<u>\$0.00</u>
Total Expenses and Costs for this Invoice	<u>\$529.51</u>

SUMMARY OF DISBURSEMENTS

Task Code	Amount	Task Description
E110	427.84	Out-of-town travel
E111	101.67	Meals
Total	<u>\$529.51</u>	

Total For This Invoice	<u><u>\$341,921.51</u></u>
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SUMMARY OF FEES

Name	Hours Worked	Hourly Rate	Bill Amount
L. Dauphin	19.50	185.00	3,607.50
T. Rinck	6.30	200.00	1,260.00
D. McClellan	137.20	310.00	42,532.00
A. Sokolosky	4.30	305.00	1,311.50
V. Driver	117.90	795.00	93,730.50
C. Stephenson	112.60	715.00	80,509.00
E. Weaver	31.10	295.00	9,174.50
A. Finch	89.80	305.00	27,389.00
T. Smith	19.90	400.00	7,960.00
M. Figueroa	3.90	250.00	975.00
R. Yates	61.30	340.00	20,842.00
N. Collins	4.70	675.00	3,172.50
C. Craig	63.30	220.82	13,978.00
J. Davis	20.00	475.00	9,500.00
J. Yoon	105.60	241.01	25,450.50
Total	797.40		\$341,392.00